

EXHIBIT 2

From: James McGinnis <JMcGinnis@sheppardmullin.com>
Sent: Monday, August 27, 2018 12:50 PM
To: Schildkraut, Marc; Bansal, Dee; 'jnorberg@nealmcdevitt.com'
Subject: Dominion's Request for Leave to File Reply

Dear Mr. Schildkraut,

We have considered both your intended motion to seek leave to file a reply and proposed added language to the protective order modification now before the Court. We view the issues as fully briefed. Whatever arguments Dominion now seeks to present should have been made in its extensive memorandum and accompanying declaration. The previous eight months of meet and confer communications gave Dominion ample opportunity to frame and present its arguments and proposed modification, as did the Court's briefing schedule. It is time for a ruling and for discovery to proceed.

The new language you propose does not change our views because it does not address the central flaw in the proposed modification. As we have detailed in our memorandum, the language has no support in fact or law, and no belated addition can render it acceptable. Defendants have honored the well accepted competitive decisionmaking standard by the assurances Dominion asked for and received. Those assurances should have resolved this issue long ago.

We will appreciate your attaching this meet and confer correspondence to your motion and making clear to the Court that defendants oppose Dominion's request for leave to file a reply brief.

Very truly yours

James McGinnis

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